

MARK J. BENNETT 2672
Attorney General of Hawai'i

JAMES E. HALVORSON 5457
NELSON Y. NABETA 3004
Deputy Attorneys General
Department of the Attorney
General, State of Hawai'i
235 S. Beretania Street, 15th Floor
Honolulu, Hawai'i 96813
Telephone: (808) 587-2900
Facsimile: (808) 587-2965

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ROBERT SHEREZ,

Plaintiff,

vs.

STATE OF HAWAII, DEPARTMENT
OF EDUCATION; PATRICIA
HAMAMOTO, Superintendent of
Hawai'i Schools; MEREDITH
MAEDA, Principal, Castle High
School; SARA GRONNER or
GRONNA, Vice Principal of Castle
High School,

Defendants.

Civil No. 04-00390 JMS/KSC

DEFENDANTS MEREDITH MAEDA
AND SARAH GRONNA'S MOTION
IN LIMINE TO PRECLUDE THE
INTRODUCTION OF EVIDENCE
REGARDING MATTERS NOT
PLED IN THE CHARGE OF
DISCRIMINATION BEFORE THE
HAWAII CIVIL RIGHTS
COMMISSION; MEMORANDUM IN
SUPPORT OF MOTION;
DECLARATION OF NELSON Y.
NABETA; EXHIBIT "A";
CERTIFICATE OF SERVICE

Trial: March 28, 2007

Judge: The Honorable
J. MICHAEL SEABRIGHT

DEFENDANTS MEREDITH MAEDA AND SARAH GRONNA' S
MOTION IN LIMINE TO PRECLUDE THE INTRODUCTION OF
EVIDENCE REGARDING MATTERS NOT PLED IN THE CHARGE OF
DISCRIMINATION BEFORE THE HAWAII CIVIL RIGHTS COMMISSION

COMES NOW, Defendants MEREDITH MAEDA and SARAH GRONNA, in their individual capacities (hereinafter referred to collectively as Defendants), by and through their attorneys, Mark J. Bennett, Attorney General, and James E. Halvorson and Nelson Y. Nabeta, Deputy Attorneys General, hereby moves this Court for an order prohibiting Plaintiff from introducing evidence as to matters not pled before the Plaintiff's charge of discrimination and retaliation.

This motion is made pursuant to the Court's Second Amended Rule 16 Scheduling Order filed on February 22, 2007, Rule 7 of the Federal Rules of Civil Procedure, and Rules 7.1 and 16.9 of the Local Rules of Practice for the United States District Court for the District of Hawai'i, and is based upon the accompanying supportive memorandum and the records and files herein.

DATED: Honolulu, Hawai'i, March 7, 2007.

/s/ NELSON Y. NABETA
NELSON Y. NABETA
Deputy Attorney General

Attorney for Defendants